

# USACE Review comments of March 2017 Technical Memorandum for Development and Screening of Remedial Alternatives

## Rolling Knolls Landfill Superfund Site

- General: Provide a table of specific COCs and corresponding PRGs.
- General: Please ensure that the draft Feasibility Study follows the format prescribed in the EPA Guidance document to allow for straight-forward government review.
- 3.1.2 BHHRA Results – Define RME and CTE in the text.
- 4.1.2 Groundwater – Consider adding a figure which shows the limits of groundwater contamination. The text states off-site groundwater migration is not an issue. It's difficult to understand the limits of groundwater contamination without a figure.
- 4.3 Preliminary Remedial Action Objective – These RAOs are rather vague. They should be tied to a specific COC or class of COCs and a contaminant concentration to which the control is required.
- 5.5.3 Groundwater (pg. 32, 1<sup>st</sup> bullet) – Cutoff trenches, sheet piling and reactive walls could be used for groundwater source control discussed under Alternative 3 in Section 6.2.2 as effectively as capping and don't require as extensive of an infrastructure for installation. Consider retaining these options.
- 6.2.1 Soil – Alternative 3, 4 and 5 discuss the infrastructure issues which make truck access difficult. Provide additional elaboration like what is in paragraph 3 of the executive summary as to site access restrictions. Also provide a figure of the best available haul route.
- 6.2.2 Alternative 2: Monitored Natural Attenuation – MNA is a remedy which relies the chemical and physical processes which naturally degrade a plume. Please provide a description of likely MNA processes occurring at the site and if site monitoring indicates MNA is happening at the site.
- 7 Summary and Recommendations – Are all 12 soil and 19 groundwater remedial alternatives being evaluated in the FS or just the five for soil and four for groundwater which were developed? Please clarify in the last paragraph.
- Table 5.1 and 5.2 – Please provide a \$ range for high, moderate and low cost.
- Table 5.1 and 5.2 – Consider adding columns to evaluate overall protectiveness of human health and the environment, and compliance with ARARs.